

Stepan

Stepan Company

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DATE March 31, 2008

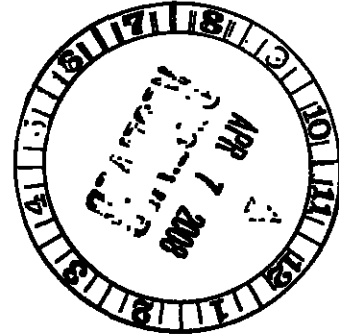
VIA FIRST CLASS MAIL

Anne K. Quinlan, Acting Secretary
Surface Transportation Board
395 E Street, S W
Washington, DC 20423-0001

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Office of Proceedings

APR 25 2008

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Public Record



Re Finance Docket No 35081
Canadian Pacific Railway Company, et al - Control - Dakota, Minnesota & Eastern Railroad Corp, et al

Dear Acting Secretary Quinlan

I am writing on behalf of Stepan Company (SC) in connection with the above-referenced proceeding SC ships Cleaning Scouring and Washing Compounds and is a regular user of railroad transportation for the movement of this product Of particular note here is our use of the services of The Kansas City Southern Railway Company ("KCSR") for transportation from Millsdale, IL on the CN and Harrisonville, MO on the MNA which service is provided in cooperation with the Iowa, Chicago & Eastern Railroad Corporation ("IC&E") We are prompted to write to express our concern about the possible loss of cooperative IC&E- KCSR service to Joplin, MO via Kansas City, and to urge the Board to take appropriate action to ensure that this important competitive rail service option remains viable and available to shippers

As KCSR's comments in the above proceeding indicate, KCSR and IC&E are partners in providing rail transportation between Millsdale, IL on the CN and Harrisonville, MO on the MNA SC regards ICE-Kansas City-KCSR service to Joplin, MO as an important competitive alternative to Union Pacific Railroad Company's ("UP") service in the same market As KCSR has pointed out, if Canadian Pacific Railway Company ("CP") is permitted to acquire unconditioned control of IC&E, CP may no longer have an incentive to work with KCSR for Chicago traffic because such service would compete with the same service currently provided by UP

SC urges the Board to preserve KCSR's ability to compete against UP/CP routings to/from Chicago In the event that CP is permitted to acquire control of IC&E, we urge the Board to condition its approval of the proposed transaction upon the Chicago access relief that KCSR has sought in its comments Such a condition is important to ensure that shippers, such as SC, continue to enjoy an ICE / KCS routing to Kansas City If no such a condition is imposed, SC will have lost a viable competitive alternative for rail transportation to/from the Chicago gateway

Sincerely,

Larry Prince
Transportation Supervisor - Rail

cc Nickolas V Pagano Jr